

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re

Free Speech Systems, LLC,

Debtor,

Neil Heslin, et al,

Appellants.

Case No. 4:24-CV-03882

(Appeal in Bankr. Case No. 22-
60043 (CML))

**STIPULATION OF VOLUNTARY DISMISSAL OF APPEAL
PURSUANT TO FED. R. BANKR. P. 8023(a)**

Appellants Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and the Estate of Marcel Fontaine (the “Appellants”) and Appellees Christopher R. Murray solely in his capacity as chapter 7 trustee of the bankruptcy estate of Alexander E. Jones and sole owner of Free Speech Systems LLC, William Aldenberg, Erica Ash, Jacqueline Barden, Mark Barden, Jennifer Hensel, Ian Hockley, Nicole Hockley, Robert Parker, William Sherlach, Carlos M. Soto, Donna Soto, Carlee Soto Parisi, Jillian Soto-Marino, David Wheeler, and Francine Wheeler (collectively, the “Appellees,” together with the Appellants referred to herein as the “Parties”) hereby enter into this Stipulation and agree as follows:

1. Appellants wish to voluntarily dismiss this Appeal pursuant to Federal Rule of Bankruptcy Procedure 8023(a).

2. Appellees do not oppose dismissal of this Appeal.

3. The Parties agree that each shall bear their own respective costs, fees, and expenses, including all attorneys' fees, incurred in connection with this Appeal.

4. Federal Rule of Bankruptcy Procedure 8023(a) provides that "[t]he clerk of the district court . . . must dismiss an appeal if the parties file a signed dismissal agreement specifying how costs are to be paid and pay any fees that are due."

5. Pursuant to Federal Rule of Bankruptcy Procedure 8023(a), the Parties submit this Stipulation requesting the voluntary dismissal of the above-captioned appeal.

Respectfully submitted this 6th day of May 2025.

/s/ Erin E. Jones

JONES MURRAY LLP

Erin E. Jones (TX 24032478)
602 Sawyer St., Suite 400
Houston, TX 77007
Telephone: (832) 529-1999
Fax: (832) 529-3393
E-mail: erin@jonesmurray.com

PORTER HEDGES LLP

Joshua W. Wolfshohl (TX 24038592)
1000 Main Street, 36th Floor
Houston, Texas 77002
Telephone: (713) 226-6000
Fax: (713) 228-1331
E-mail: jwolfshohl@porterhedges.com

***Co-Counsel for Christopher R. Murray,
Chapter 7 Trustee***

/s/ Ryan E. Chapple

CAIN & SKARNULIUS PLC

Ryan E. Chapple (TX 24036354)

/s/ Jennifer J. Hardy

**WILLKIE FARR & GALLAGHER
LLP**

Jennifer J. Hardy
State Bar No. 24096068
600 Travis Street
Houston, TX 77002
Telephone: (713) 510-1766
Fax: (713) 510-1799
E-mail: jhardy2@willkie.com

**WILLKIE FARR & GALLAGHER
LLP**

Stuart R. Lombardi (*pro hac vice*
forthcoming)
787 Seventh Avenue
New York, NY 10019
Telephone: (212) 728-8000
Fax: (212) 728-8111
E-mail: slombardi@willkie.com

LAWSON & MOSHENBERG PLLC

Avi Moshenberg

303 Colorado Street, Suite 2850
Austin, Texas 78701
Telephone: (512) 477-5000
Fax: (512) 477-5011
E-mail: rchapple@cstrial.com

KOSKOFF KOSKOFF & BIEDER PC

Alison C. Stirling (admitted *pro hac vice*)
350 Fairfield Avenue
Bridgeport, CT 06604
Telephone: (203) 336-4421
E-mail: asterling@koskoff.com

**PAUL WEISS, RIFKIND WHARTON
& GARRISON LLP**

Kyle J. Kimpler (admitted *pro hac vice*)
Paul A. Paterson (admitted *pro hac vice*)
Daniel Negless (admitted *pro hac vice*)
Vida Robinson (admitted *pro hac vice*)
1285 Avenue of the Americas
New York, NY 10019-6064
Telephone: (212) 373-3000
Fax: (212) 757-3990
E-mail: kkimpler@paulweiss.com
E-mail: ppaterson@paulweiss.com
E-mail: dnegless@paulweiss.com
E-mail: vrobinson@paulweiss.com

Co-Counsel to the Connecticut Plaintiffs

State Bar No. 24083532
801 Travis Street, Suite 2101, #838
Houston, TX 77002
Telephone: (713) 449-9644
E-mail:
avi.moshenberg@lmbusinesslaw.com

**BRADLEY ARANT BOULT
CUMMINGS LLP**

Jarrold B. Martin
State Bar No. 24070221
600 Travis Street, Suite 5600
Houston, TX 77002
Telephone: (713) 576-0388
Fax: (713) 576-0301
E-mail: jbmartin@bradley.com

Co-Counsel to the Texas Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was filed and served on all persons entitled to receive notice via operation of this Court's CM/ECF system on May 6, 2025.

/s/ Jennifer J. Hardy
Jennifer J. Hardy